

**EXHIBIT A TO DEFENDANTS' MOTION TO EXCLUDE
SUZANNE PARISIAN, M.D. [WAVE 11]**

Pursuant to the third Amended Docket Control Order, Defendants submit the following list of cases applicable to Defendants' Motion to Exclude Suzanne Parisian, M.D., in Wave 11 where Dr. Parisian is named as a general retained regulatory expert.¹

List of Applicable Cases

Dr. Parisian has submitted an expert report in MDL 2327 for two products: the Prolift + M and the TVT Secur. *See* Pl. General Retained Experts, Wave 11. Defendants therefore adopt their prior briefing in the following cases, only to the extent that the TVT Secur or Prolift + M is at issue:

Plaintiff's Last Name	Plaintiff's First Name(s)	Docket No.	Product(s)
Bailey	Diane Michelle	2:14-cv-03875	MiniArc (AMS) and Prolift +M Posterior
Baldwin	Amanda Ann	2:12-cv-09515	TVT Secur
Garver	Susanna B.	2:13-cv-29117	TVT Secur
Hass	Joni Celestino	2:15-cv-09562	Prolift +M Anterior and *TVT-O
Placido	Tracy	2:13-cv-22170	Prolift +M Total and TVT Secur
Richards	Katrina M.	2:13-cv-24539	TVT Secur
Simmons	Phyllis Snuffer	2:14-cv-00839	Desara (Caldera) Prolift Anterior, Prolift +M Posterior, and *Prosima Posterior

¹ Plaintiffs' designation states that they recognize the Fourth Circuit's affirmance of this Court's exclusion of evidence of compliance with the 510(k) process and "reserve the right to designate" Dr. Parisian "[i]n the event of a contrary ruling." Pl. Expert Disclosure at p. 4. Ethicon understands this to mean that Dr. Parisian is not designated at all if no FDA evidence is admitted, even though this is potentially inconsistent with Dr. Parisian's current disclaimer of reliance on FDA regulations. In addition, Ethicon notes that this "reservation of right to designate" in some instances puts Plaintiffs' number of experts over the allotted five.

To the extent the above cases do not involve the TVT Secur or Prolift + M (indicated with an * above as related to other Ethicon products), and in all of the following cases, Dr. Parisian has been designated as an expert but has not served an expert report as to the TVT Secur or Prolift + M. Thus, she may not render any opinion as to those products:

Plaintiff's Last Name	Plaintiff's First Name(s)	Docket No.	Product(s)
Comouche	Tina M. Carrozza Vice	2:15-cv-02095	TVT Exact
Johnson	Deborah Jane Mullineaux	2:14-cv-00773	Prolift Total and TVT-O
McCormack	Elizabeth	2:13-cv-26057	Prolift Total and TVT-O
Meindertsma	Jeanne Marie Ormond	2:13-cv-23903	Monarc (AMS) and Prolift Total
West	Sherrill A. O'Neill	2:12-cv-03180	Gynemesh PS and TVT-O